

Federal Defenders
OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

Barry D. Leiwant
*Interim Executive Director
and Attorney-in-Chief*

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

December 15, 2023

BY ECF

The Honorable Paul G. Gardephe
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: **United States v. Daniel Bertini**
23-CR-0061 (PGG)

Dear Judge Gardephe:

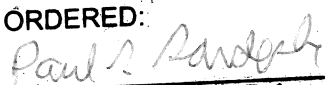
Daniel Bertini, through undersigned counsel, respectfully submits this letter in support of his request for permission to visit his partner and her mother at their home in Queens, New York on Christmas Day, which is Monday, December 25, 2023. The address to the home has been provided to pretrial services. If granted permission, Mr. Bertini would be leaving from and returning to his home in Manhattan, New York all on the same day. Furthermore, he would notify his pretrial officer both once he leaves and once he returns home.

Undersigned counsel has conferred with pretrial services and the government about this request. Pretrial services takes the position that, as a matter of policy, it objects to all social event requests for individuals on home detention. Pretrial services did, however, note Mr. Bertini's

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: Dec. 15, 2023

compliance with his conditions of release.¹ The government defers to pretrial services on this matter.

Respectfully Submitted,

/s/

Kristoff I. Williams
Assistant Federal Defender
Federal Defenders of New York
(212) 417-8791

Cc: United States Pretrial Services Officer Francesca Piperato (via email);
Assistant United States Attorneys Jonathan Bodansky (via ECF)

¹ To that point, Mr. Bertini has maintained full-time employment while on release. He has thus demonstrated that he can be trusted to leave his home.